

STC:ts
08/24/2023

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO, WESTERN DIVISION**

United States of America

Case No. 3:23 MJ 8003

Plaintiff

Magistrate Judge Darrell A. Clay

-vs-

Whitney M. Durant AKA Soren Monroe

**MOTION FOR MODIFICATION OF BOND
CONDITIONS**

Defendant

Scott T. Coon (0001918)
RAYLE, MATTHEWS & COON
100 South Main Street
Bowling Green, Ohio 43402
TEL: (419) 354-4442
FAX: (419) 353-9934
EMAIL: scoon@rmclawfirm.com
Attorney for Defendant

Now comes Defendant, by and through her counsel, and respectfully requests this Court for an Order modifying the conditions of the Defendant's Bond to vacate the requirement that she not use illegal drugs or controlled substances.

The Defendant suffers from PTSD and anxiety disorders and her treating physician has recommended that she be permitted to use prescribed medical marijuana to treat her conditions.

See attached correspondence.

WHEREFORE, Defendant requests the Court modify the conditions of her Bond accordingly.

RAYLE, MATTHEWS
& COON
ATTORNEYS AT LAW
100 SOUTH MAIN STREET
BOWLING GREEN, OHIO 43402
(419) 354-4442

Respectfully submitted,



Scott T. Coon
Attorney for Defendant

CERTIFICATION OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was forwarded by regular U.S. Mail on the 25 day of August, 2023 to Prosecuting Attorney Angelita Cruz Bridges, Office of the U.S. Attorney – Toledo, Northern District of Ohio, Ste. 308, Four SeaGate, Toledo, OH 43604-2624.



Scott T. Coon
Attorney for Defendant





August 9, 2023

To Whom It May Concern:

After seeing **Soren Durant** in a professional, clinical setting since May of 2022, I have given her the following diagnoses:

Generalized Anxiety Disorder 300.02 (F41.1)
Post-Traumatic Stress Disorder 309.81 (F43.10)

I have discussed the medical benefits and risks of cannabis use with Soren as a treatment for these medical conditions. If she chooses to use cannabis therapeutically, I will continue to monitor her condition and provide advice and aid for her progress.

Please feel free to contact me with any questions or concerns.

Be Hopeful,

Kearston A. Rudolph, MA, LSC, LPC
Bridges Counseling of Ohio

"Attitude is a little thing that makes a BIG difference."
~ Winston Churchill



614-284-8922 (phone)
855-865-9164 (fax)

Worthington Office: 885 High Street, Suite 106, Worthington, OH 43085

Marysville Office: 246 W. 5th Street, Suite 203, Marysville, OH 43040

614-284-8922 855-865-9164 (fax)

www.bridgescounselingohio.com

Treatment Plan

Whitney Durant

Jul 25, 2023

Ohio Cannabis Connection
8354 Princeton Glendale Rd., Suite 203
West Chester, OH 45069
(513) 857-5025

I have evaluated this patient and determined that they qualify for the Ohio Medical Marijuana Control Program.

Patient name

First name

Whitney

Last Name

Durant

Qualifying Condition(s)

PTSD

Reason For Recommendation

To complement standard medical treatment

As an eventual alternative to standard medical treatment

Treatment Goals

Pain relief

Improve sleep

Reduce/prevent opioid use

Reduce anxiety

Reduce muscle spasms

Reduce nausea

Increase appetite

Reduce intraocular pressure

Seizure control

Other

Recommended Form of Administration

Vaping

Edible

Topical

Tincture

Transdermal Patch

All forms

Recommended Usage

As needed to alleviate symptoms

Other

Recommended Strain Type

THC dominant

50:50 THC/CBD

CBD dominant

All strain types

*** The above are my recommendations; however, you may purchase any product you want at the dispensary and you are not restricted to a specific form or strain type.

Notes

General Guidelines For The Use Of Medical Marijuana Products

While there is no "correct dosing" of medical marijuana (MMJ) due to multiple factors such as tolerance, body weight, method of consumption, interactions with other medications, etc., I recommend you start with edible products. Other forms discussed below are vaping/inhalation, topicals, sublingual tinctures, and patches.

STRAINS

There are two major strains of cannabis – Indica and Sativa.

Indica: Described as "In DA Couch". Indica strains are generally recommended for nighttime use as they have more pain relieving and anti-anxiolytic properties and generally help patients relax and sleep.

Sativa: Sativa strains cause the opposite effects of Indica strains. They usually cause more arousal, are excitatory, and have often been used for creative thinking. They are therefore recommended primarily for daytime use.

Hybrid: Hybrid strains are a mix of Indica and Sativa strains - Indica Hybrid meaning more Indica than Sativa and vice versa. These are to limit possible extreme effects (increased drowsiness or super excitatory) and are usually well-tolerated by most people and therefore often preferred.

It is important to know that while the respective properties of the strains exist, some people might find Indica strains to be excitatory and the Sativa strains to be anxiety relieving and sleep inducing. Therefore, for new patients we always recommend a trial period of two to three days where you can try both and determine the effect it has on you.

DOSING AND CONSUMPTION

For new patients, I recommend you start at 1-5 mg and increase as tolerated. You are limited to purchase up to a 90 day supply at any given time as specifically outlined by the State of Ohio Board of Pharmacy dispensing limits.

Once you have purchased your 90 day supply, you will have to wait for the next 90 day cycle to begin before you can purchase more.

For example, if you purchase your 90 day supply in 84 days, you will have to wait six days to purchase any more MMJ products.

Edibles: A standard dose is 10 mg and I recommend you start at 1-5 mg. You can purchase Indica or Sativa strain edibles. I recommend use of Indica strains at night and Sativa strains during the day. I recommend you ideally wait about 90 to 120 minutes after any meal before consuming the edibles and wait 90 to 120 minutes for full effect to take place. If you do not feel any benefit after 120 minutes, then you can take an additional dose. Over time, you will develop some tolerance and it is recommended to slowly increase your dose in 2.5 mg to 5 mg increments. Edibles are best consumed for nighttime due to their long-acting nature but can be used during the day as well to manage your symptoms as long you stay within the guidelines of safe use as outlined.

Vaping/ Flower: Same guidelines for specific strain use as above. Vaping/ flower products are generally faster acting but not as long lasting. Once again, no "correct dosing" exists for the use of any of the inhalation forms (flower, waxes, dabs, etc.) due to factors including lung function, chronic lung diseases such as asthma, COPD, or cardiovascular diseases and if you do suffer from any of those, I highly recommend that you refrain from using any inhalation forms. You should start off by taking 1 to 2 "hits" or deep inhalations and wait 10 to 15 minutes to determine the effects/benefits on your symptoms. You can take up to 5 hits at a time with the effects generally lasting 3 to 4 hours. Most vaping products (cartridges, pens, etc.) generally last approximately 150 hits and, therefore, your consumption determines how long a vape pen lasts.

Topicals: Topicals are a great treatment option for both day and nighttime. Topical products can be used for nausea and vomiting relief, pain relief and to stimulate appetite. Patients find relief in various joints including neck, shoulders, back and smaller joints such wrist, fingers, elbows, etc. I recommend the use of topical products in a one-to-one ratio - i.e., CBD:THC in 1:1 formulation for best relief.

While there are multiple other forms of consumption available at the different medical marijuana dispensaries in Ohio, I encourage you to start off with the use of vaping/flower, topical and edible forms due to their ease of use, combination of short and long-acting effects. It is also recommended to discuss your issues with the MMJ pharmacists at the dispensaries since they are a great resource of all new products and strains they have in stock. It usually takes most patients with average use (3 to 4 times per week) approximately one to three months to determine what dosage - whether it is edibles, or number of hits - works best for them. If you suffer from a higher disease burden requiring daily use, your tolerance generally will increase quicker, thus requiring higher doses of medical marijuana in which case I recommend micro-dosing your products (i.e., daily use of lowest effective dose) to maintain steady state of medical marijuana in your system to keep your symptoms at a minimum.

FOLLOW-UP

You will receive a follow up questionnaire every three months from our office to determine how your symptoms are being managed and updates on the use of products or changes in your medical history so please make sure to follow up and respond to those emails. While not a requirement, the questionnaire, along with your OARRS report, helps us determine your usage and benefits of MMJ (or lack thereof) and aids in making an informed decision for your yearly renewal as well. Also, if you have had any major side effects from any specific products, we would like to know about it so it can be added to your Electronic Medical Record (EMR).

Your consumption and purchases are monitored by the Ohio Board of Pharmacy on the Ohio Automated Rx Reporting System or OARRS report which is updated with the purchased quantity every time you make a purchase at any of the Ohio medical marijuana dispensaries. While I always recommend use of the lowest effective dose, it is understood that this will be different for everyone due to the reasons described above. Furthermore, depending on your medical condition, tolerance, etc. your consumption might be higher than other patients. However, you cannot exceed the limits set forth by the Ohio Board of Pharmacy, which is the same for all patients, except those with a documented terminal condition.

You can always reach our office staff for any general questions and for any detailed questions regarding dosages, products, etc., and you can email us as well. I hope our office has provided you with great service and we are happy to help you manage your symptoms.

e-signature

Sampath Medepalli MD

Signed by Columbus on Jul 25, 2023 at 12:46 PM from IP 98.29.11.***

Jul 25, 2023